

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION AT DAYTON

In re: Evan Karambelas

Debtor

: CASE NO.: 15-33955  
: (Chapter 13)  
:  
: JUDGE LAWRENCE WALTER

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**MOTION FOR MODIFICATION OF PLAN POST CONFIRMATION AND NOTICE**

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The Debtor hereby moves the Court for an Order to modify the Chapter 13 Plan. Support for the motion is set forth in the following memorandum.

**MEMORANDUM IN SUPPORT**

A plan has been confirmed.

Date petition filed: 11/30/2015

Date of last modification: NA

Date plan confirmed: 04/19/2016

Date last modification confirmed: NA

Monthly Plan Payments:

Current: \$1100.00

Proposed: \$900.00

If the plan changes the monthly payments, amended Schedules I and J are attached.

Percent to Unsecured Creditors:

Current: 38%

Proposed: 38%

Length of Plan (months): Current: 60

Proposed: 60

(Above median income case must be a 60 month plan unless plan is repaying 100% to the general unsecured creditors.)

**The effective date is the date of the entry of the Order.** For calculation purpose, the Trustee will use the motion filed date.

The Debtor is responsible for any increase in the Payroll Deduction until such payment is adjusted.

Reason for the modification, including any changes in circumstances since last plan:

The Debtor's Final Judgment and Decree of Divorce has been filed. The amount the Debtor must pay in spousal support has decreased his excess income significantly.

Debtors' attorney will make separate application for additional attorney fees as provided by LBR 2016-1.

/s/ Russ B. Cope  
Attorney for Debtor

/s/ Evan Karambelas  
Debtor

**MODIFICATION OF CHAPTER 13 PLAN**

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Creditor name: All unsecured creditors on the attached matrix

Type of Claim: ( ) secured ( x ) unsecured ( ) 507 priority ( ) other

Nature of Claim:

Current Plan: 38%

Proposed Plan: 38%

(15-33955)

## NOTICE OF MOTION FOR MODIFICATION OF PLAN POST CONFIRMATION

The Debtor has filed a Motion for Modification of Plan Post Confirmation.

**Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the court to grant the relief sought in the Motion, then on or before **twenty –one (21) days from the date set forth in the certificate of service for the motion**, you must file with the court a response explaining your position by mailing your response by regular U.S. Mail to Clerk, U.S. Bankruptcy Court, Southern District of Ohio, 120 W. Third St., Dayton, Ohio 45402 OR your attorney must file a response using the court's ECF System.

The court must receive your response on or before the above date.

You must also send a copy of your response either by 1) the court's ECF system or by 2) regular U.S. Mail to:

Evan Karambelas  
6720 Whitaker Street  
Dayton, Ohio 45415

Russ B Cope, Esq.  
6826 Loop Road  
Dayton, OH 45459

Jeffrey M. Kellner  
Chapter 13 Trustee  
131 N. Ludlow St.  
Dayton, Ohio 45402

Office of the U.S. Trustee  
170 North High St., Suite 200  
Columbus, Oh 43215

If you or your attorney do not takes these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief without further hearing or notice.

**CERTIFICATE OF SERVICE**

I hereby certify that on November 30, 2016, a copy of the attached was served on the following ECF participants electronically through the court's ECF System at the email address registered with the court.

Jeffrey M. Kellner, Chapter 13 Trustee

Office of the U.S. Trustee

Bradley Smith

And on the following by ordinary U.S. Mail, on November 30, 2016:

Evan Karambelas, 6720 Whitaker Street, Dayton, Ohio 45415

Ace Cash Express, Inc, 1231 Greenway Drive, Suite 700, Irving, TX 75038

Ace Cash Loan, 3516 W Siebenthaler, Dayton, OH 45406

Advance America, 606 Taywood Road, Englewood, OH 45322

American General Financial/Springleaf, Springleaf Financial/Attn: Bankruptcy, Po Box 3251  
Evansville, IN 47731

Anesthesiology Services Network, PO Box 632317, Cincinnati, OH 45263

Capital One, Attn: Bankruptcy, Po Box 30285, Salt Lake City, UT 84130

Cashland, 17 Triangle Park, Cincinnati, OH 45246

Cashland, 6375 Chamberburg Rd., Dayton, OH 45424

Chase Card, Po Box 15298, Wilmington, DE 19850

Check In Cash, 170 Woodman Dr., Dayton, OH 45431

CheckSmart, 7645 Old Troy Pike, Dayton, OH 45424

Citibank Sd, NA, Attn: Centralized Bankruptcy, Po Box 20363, Kansas City, MO 64195

City of Clayton, 6996 Taywood Road, Englewood, OH 45322

City of Dayton, Div. of Revenue and Taxation, 101 West Third Street, Dayton, OH 45402

Code C U I/I, 355 W Monument Ave., Dayton, OH 45402

Code Cr Un, 355 W Monument Ave., Dayton, OH 45402

Code Credit Union, 335 Monument Avenue, Dayton, OH 45402

CODE Credit Union, Inc., 355 West Monument Avenue, Dayton, Ohio 45402

Eagle Loan Company of Ohio Inc., 807 Union Blvd., Englewood, OH 45322-2102

Fidelity Health Care, 3832 Kettering Blvd., Dayton, OH 45439-2017

IRS, Kansas City Service Center, Kansas City, MO 64999-0025

KCI Medical Company, PO Box 659508, San Antonio, TX 78265

Miami Valley Emergency Spclst., PO Box 951426, Cleveland, OH 44193

Miami Valley Hospital, P.O. Box 932715, Cleveland, OH 44193

NCP Finance Ohio, LLC, 205 Sugar Camp Circle, Dayton, OH 45409

Ohio Attorney General, Collections Enforcement Section, Attn: Bankruptcy, 150 E. Gay St., 21 Fl. Columbus, OH 43215

Ohio Department of Taxation, Attn: Bankruptcy Division, PO Box 530, Columbus, OH 43216-0530

Quantum3 Group LLC as agent for ACE Cash Express INC., PO Box 788, Kirkland, WA 98083-0788

Quantum3 Group LLC as agent for Sadino Funding LLC, PO Box 788, Kirkland, WA 98083-0788

Quickn Loans, 1050 Woodward Ave., Detroit, MI 48226

River Valley Credit Un., 505 Earl Blvd., Miamisburg, OH 45342

Springleaf Financial Services, 7702 Hoke Road, Clayton, OH 45315

Springleaf Financial Services, PO Box 3251, Evansville, IN 47731

US ATTORNEY, 602 FEDERAL BUILDING, 200 W SECOND STREET, DAYTON, OH 45402

Wright State Physicians, PO Box 1144, Dayton, OH 45401

Wright State Physicians Surgery, ATTN: 8716K, PO Box 14000, Belfast, ME 04915-4033

Served By: /s/ Russ B. Cope